

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
VICTORIA DIVISION**

In re:	§	Chapter 7
	§	
ARTHUR JACOB BRASS,	§	Case No. 21-60025
	§	
Debtor.	§	
VITOL INC.	§	
	§	
v.	§	Adversary No. 21-06006
	§	
ARTHUR JACOB BRASS	§	

**PLAINTIFF VITOL INC.'S OBJECTIONS TO  
DEFENDANT ARTHUR BRASS' TRIAL EXHIBITS**

Plaintiff Vitol Inc. (“**Plaintiff**”) submits its *Objections* to the *Trial Exhibits* [Docket No. 104] identified by the Defendant Arthur Jacob Brass (“**Defendant**”) as follows:

**EXHIBITS**

Brass Ex. No.	Description	Objection
1	5-18-15 Email early JV talk	
2	5-3-17 Kuo email to Bake	
3	6-26-17 Email re JV Business	FRE 106 (optional completeness)
4	7-13-17 Emails re Gravity (Barth)	
5	7-13-17 Emails re Gravity (Kuo)	
6	7-25-17 Email Fay to Kuo (why NEWCO)	
7	7-25-17 Email string Newco personnel and costs	
8	7-31-17 Bake Email (regrets)	
9	7-31-17 Email re Chris Bake	
10	7-31-17 Email re GCAC Telcon	
11	8-8-17 Email re Personnel Costs	
12	8-10-17 Barth email	
13	8-17-17 Emails re Nick Fay rebukes Kuo	

Brass Ex. No.	Description	Objection
14	8-21-17 Jason Email re Interim Financing	
15	9-27-17 Chris Bake email	
16	10-13-17 Dan Sargent Email	
17	Bake and Fay emails	
18	Email for Vitol 72920	
19	Email for Vitol 74289	
20	Email for Vitol 76284	
21	April 2018 Settlement Communication	
22	\$1.2M check	
23	Kuo Text Messages	
24	Rio JSMA Fully Executed	
25	Redline - Vitol JSMA NewCo Draft Jun 20 2017 Sent to Vitol Jun 20 2017 a..	
26	Copy of FULLER000005 (Native To Be Utilized)	FRE 802 (hearsay)
27	Copy of VITOL_00072105 (Native To Be Utilized)	
28	Copy of VITOL_00072920 (Native To Be Utilized)	
29	Copy of VITOL_00074289 (Native To Be Utilized)	
30	Copy of VITOL_00076284 (Native To Be Utilized)	
31	Fuller Report	FRE 801 (hearsay); FRCP 26 (expert testimony not previously disclosed)
32	Rebuttal Report of Bob Broxson (rec'd 03.23.20)	FRE 801 (hearsay); FRCP 26 (expert testimony not previously disclosed)
33	Settlement Agreement	
34	First Amended Complaint	
35	Response To MSJ	
36	Vitol Inc.'s Amended Emergency Motion For Leave	
37	Initial Disclosures - Vitol	
38	Vitol Responses to RFP	
39	Vitol Responses to Rogs	
40	Vitol's Responses to RFA	
41	Rio-Vitol Assignment Agreement	
42	Goldstein, Jason - full (taken 05.16.19)	FRE 801 (hearsay)
43(a)	Goldstein, Jason Exhibits 18-29 (taken 05.16.19)	FRE 801 (hearsay)

Brass Ex. No.	Description	Objection
43(b)	Goldstein, Jason Exhibits 18-29 (taken 05.16.19)	FRE 801 (hearsay)
44	Perugini, Patrick - condensed (taken 06.29.2018)	FRE 801 (hearsay)
45	Perugini, Patrick Ex 11-17 (taken 06.29.18)	FRE 801 (hearsay)
46	Brass, Arthur - full (taken 06.28.18)	FRE 801 (hearsay)
47	Brass, Arthur Exhibits 1-10 (taken 06.28.18)	FRE 801 (hearsay)
48	Adversary Docket	
49	Bankruptcy Docket	

Dated: **August 29, 2022.**

Respectfully submitted,

By: /s/ Keith M. Aurzada

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### **CERTIFICATE OF SERVICE**

I hereby certify that on **August 29, 2022**, a true and correct copy of the above foregoing document was served via the Court's Electronic Case Filing (ECF) system on all parties registered to receive electronic service in this matter, including counsel for the Defendant.

/s/ Keith Miles Aurzada

Keith M. Aurzada